

Motion for Protective Order

2 19 CV 4857

Judge Morrison MAGISTRATE JUDGE JOLSON

Demarco Amato
370 S. Front St.
Columbus, OH 43215
September 12, 2019

I, Demarco Amato, respectfully move this ^{court} for a blanket protective order to shield relevant and non-privileged information as used in Seattle Times Co. v. Rhinehart (467 U.S. 20, 35-36 104 S.Ct. 2144). Protective orders are described as essential to the functioning of civil discovery in Bayer AG and Miles Inc. v. Barr Laboratories Inc. (162 F.R.D. 456, 65 S.D.N.Y.). The purpose being to protect litigants from embarrassment and oppression from unnecessary pre-trial disclosures of private information (en re Cypressen Injunction, 474 F. Supp. 2d 385, 421 E.D.N.Y.). I request no hard copy or digital public records be made available of any briefs, motions, affidavits or exhibits I submit related to this action.

Affidavit in support

I will be submitting documents discussing my protected health information and medical records and ask that the information be kept from the public by seal or protective order of this Court.

I attest the statement above
to be true under penalty of perjury
Demarco Amato
10/3/19